EDWARD H. KUBO, JR. United States Attorney District of Hawaii

PILED IN THE UNITED STATES DISTRICT COURT DISTRICT OF HAWAII

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First Assistant U.S. Attorney

District of Hawaii

AUG 1 4 2002

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Attorneys for Plaintiff UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,) CR. NO. 02-00288 DAE Plaintiff,) SUPERSEDING INDICTMENT VS. [21 U.S.C. §§ 841 and 18 U.S.C. § 2] LAMBERT APO, (01)) MALCOLM HIRAKAWA, (02)) HARRY NAKAGAWA, (03)) JASON KUROSAWA, and (04)) JERI-ANN LEWIS, (05)) Defendants.

SUPERSEDING INDICTMENT

Count 1:

The Grand Jury charges:

On or about January 15, 2002, in the District of
Hawaii, LAMBERT APO, HARRY NAKAGAWA, and JASON KUROSAWA, did
knowingly and intentionally possess, with intent to distribute,

and distribute, in excess of fifty (50) grams of methamphetamine, its salts, isomers and salts of its isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A) and Title 18 United States Code Section 2.

Count 2:

The Grand Jury further charges:

On or about January 30, 2002, in the District of Hawaii, LAMBERT APO and MALCOLM HIRAKAWA, did knowingly and intentionally possess, with intent to distribute, and distribute, in excess of five (5) grams of methamphetamine, its salts, isomers and salts of its isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A) and Title 18 United States Code Section 2.

Count 3:

The Grand Jury further charges:

On or about February 22, 2002, in the District of Hawaii, LAMBERT APO, JERI-ANN LEWIS and HARRY NAKAGAWA, did knowingly and intentionally possess, with intent to distribute, and distribute, in excess of five (5) grams of methamphetamine, its salts, isomers and salts of its isomers, a Schedule II controlled substance, in violation of Title 21, United States

841(a)(1) and 841(b)(1)(B) and Title 18 United States Code Section 2.

DATED: Honolulu, Hawaii,

August 14. 2002

A TRUE BILL

FORÉPERSON, GRAND JURY

EDWARD H. KUBO, JR. United States Attorney District of Hawaii

ELLIOT ENOKI

First Assistant, U.S. Attorney

CHRIS A. THOMAS

Assistant /U.S. Attorney

<u>United States v. Lambert Apo, et al.</u>
"Superseding Indictment"
Cr. No. 02-00288 DAE